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7 CHOI, OFFICER SAMUEL RIVEROS,
OFFICER SUNNY KIM, CITY OF
8 BALDWIN PARK POLICE
DEPARTMENT, and CITY OF
9 BALDWIN PARK

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11 **UNITED STATES DISTRICT COURT**

12 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

13
14 FRANK LOPEZ, individually and as
successor-in-interest to Estate of
15 HELEN LUCERO (Deceased) and
CECILIA LOPEZ (Deceased); ALMA
16 MARIE LOPEZ, individually and as
successor-in-interest of Estate of
17 CECEILIA LOPEZ, Deceased,

18 Plaintiffs,

19 v.

20 OFFICER JAY CHOI, an individual;
OFFICER SAMUEL RIVEROS, and
21 Individual; OFFICER SUNNY KIM, an
INDIVIDUAL; CITY OF BALDWIN
22 PARK POLICE DEPARTMENT,
CITY OF BALDWIN PARK, and
23 DOES 1-25, Inclusive,

24 Defendants.

Case No. 2:23-cv-00802-SK
Magistrate Judge, Steve Kim

**NOTICE OF SETTLEMENT OF
ENTIRE ACTION**

Filed Date: 02/02/23
FAC Date: 05/18/23
Trial Date: 02/11/25

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26 **TO THE HONORABLE COURT:**

27 In accordance with L.R. 16-15.7, Plaintiffs FRANK LOPEZ, individually and
28 as successor-in-interest to Estate of HELEN LUCERO (Deceased) and CECILIA

LOPEZ (Deceased); ALMA MARIE LOPEZ, individually and as successor-in-interest of Estate of CECEILIA LOPEZ, Deceased, and Defendants OFFICER JAY CHOI, OFFICER SAMUEL RIVEROS, OFFICER SUNNY KIM, CITY OF BALDWIN PARK POLICE DEPARTMENT, and CITY OF BALDWIN PARK, have agreed to a settlement in principle.

The parties jointly recommend and request that the honorable Court vacate the current pre-trial dates/deadlines, trial date, and all other hearing dates and case management deadlines, including but not limited to the final pretrial conference and any set hearings for any pending motions.

It is respectfully requested that the Court maintain jurisdiction over this matter and set an Order to Show Cause Re: Dismissal of Entire Action, in ninety (90) days from now, allowing time for the settlement to be finalized.

DATED: October 14, 2024

Respectfully submitted,

KHASHAN Law Firm. APC

Bv: /s/ Lewis G. Khashan
Lewis G. Khashan
Attorney for Plaintiffs, FRANK LOPEZ,
individually and as successor-in-interest to
Estate of HELEN LUCERO (Deceased)
and CECILIA LOPEZ (Deceased); ALMA
MARIE LOPEZ, individually and as
successor-in-interest of Estate of CECILIA
LOPEZ, Deceased.

1 DATED: October 14, 2024

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

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4 By: /s/ Roslynn M. Wilfert

Mildred K. O'Linn

Roslynn M. Wilfert

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6 Attorneys for Defendants, OFFICER JAY
7 CHOI, OFFICER SAMUEL RIVEROS,
8 OFFICER SUNNY KIM, CITY OF
9 BALDWIN PARK POLICE
DEPARTMENT, and CITY OF
BALDWIN PARK

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11 I attest that all signatories listed, on whose behalf this filing is submitted, have
12 authorized the filing and concur with its contents. C.D. Cal. L.R. 5-4.3.4(a)(2)(i).

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14 /s/ Roslynn M. Wilfert

Roslynn M. Wilfert

MK MANNING | KASS